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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

No. CR 2:18-759 (A) -CJC

Plaintiff,

v.

ROBERT RUNDO, and
ROBERT BOMAN,

Defendants.

DECLARATION OF KATHRYNNE N. SEIDEN
ISO GOVERNMENT'S OPPOSITION TO
DEFENDANTS' MOTION TO DISMISS FOR
SELECTIVE PROSECUTION

Hearing Date: February 21, 2024
Hearing Time: 9:00 a.m.
Location: Courtroom of the
Hon. Cormac J.
Carney

DECLARATION OF KATHRYNNE N. SEIDEN

I, Kathrynne N. Seiden, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I am one of the attorneys assigned to represent the government in United States v. Rundo et al., 2:18-CR-759-CJC.

2. Attached as **Exhibits 1** and **2** are videos of a protest that occurred in Huntington Beach, California on March 25, 2017, which were produced to defendants at USA_00008670 and USA_00008574, respectively.

3. Attached as **Exhibits 3** and **4** are videos of a protest that occurred in Berkeley, California on April 15, 2017, which were produced to defendants at USA_00065862 and USA_00000052, respectively.

4. Attached as **Exhibit 5** is an FBI report dated September 20, 2017, which was produced to defendants at USA 00003006-07.

5. Attached as **Exhibit 6** is an FBI report dated January 2, 2018, which was produced to defendants at USA_00003017-3030.

6. Attached as **Exhibit 7** are excerpts from Robert Boman's Facebook account, which were produced to defendants at USA_00000189.

7. Attached as **Exhibit 8** is an FBI report dated August 24, 2018, which was produced to defendants at USA_00008878-880.

8. Attached as **Exhibit 9** are excerpts from the Rise Above Movement Instagram account, which were produced to defendants at USA_00070445, 70458-59, and 70474.

9. Attached as **Exhibit 10** is a report from the California Department of Parks and Recreation related to the March 25, 2017 arrest of N.H., which was produced to defendants at USA 00042377-

42382.

10. Attached as **Exhibit 11** is a report from the Berkeley Police Department related to the April 15, 2017 arrest of L.D., which was produced to defendants at USA_00028487-89.

11. Attached as **Exhibit 12** is a report from the Berkeley Police Department related to the April 15, 2017 arrest of L.R., which was produced to defendants at USA 00028551-57.

12. Attached as **Exhibit 13** is a report from the San Bernardino Police Department dated June 10, 2017, which was produced to defendants at USA 00029851-55.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Los Angeles, California, on February 5, 2024.

/s/ Kathrynne N. Seiden

KATHRYNNE N. SEIDEN

Exhibits 1-4

Manually Lodged

Exhibits 5-13

Filed Under Seal